

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL KRECHMER, a/k/a
“Michael Malice,”

Plaintiff,

-- against --

ANDREA K. TANTAROS and
ASTERO, LLC,

Defendants.
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Case No. 16-cv-7820 (KBF)

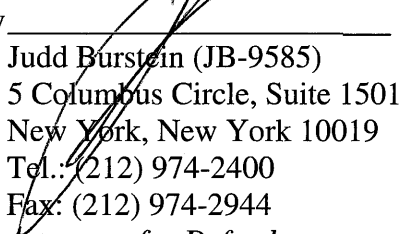
NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Judd Burstein, Esq., dated October 19, 2016, with attached exhibits, the accompanying Memorandum of Law, and all of the prior proceedings heretofore had herein, Defendants Andrea K. Tantaros and Astero, LLC (collectively, “Defendants”) will move this Court, before the Honorable Katherine B. Forrest, at the Courthouse located at 500 Pearl Street, Courtroom 23B, New York, New York 10007, at a date and time to be set by the Court, for an Order granting their Motion (a) pursuant to Fed. R. Civ. P. 12(b)(1), to dismiss the Complaint (“Complaint”) filed by Plaintiff Michael Krechmer (“Plaintiff”) for lack of subject matter jurisdiction; (b) pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss Plaintiff’s First, Second, Fourth, and Sixth Claims for Relief for failure to state a claim; (c) pursuant to Fed. R. Civ. P. 12(f)(2), to strike paragraph 40 of the Complaint; and (d) for such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Judge Forrest's Order, papers in opposition, if any, must be served upon the undersigned on or before October 27, 2016.

Dated: New York, New York
October 19, 2016

JUDD BURSTEIN, P.C.

By 
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